Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

December 13, 1999

Certifed Mail

Mr. Jim Marzolino
GNB Technologies, Inc.
2700 S. Indiana Street
Vernon, California 90058

APPROVAL OF CLASS 2 INTERIM STATUS MODIFICATION AT GNB TECHNOLOGIES, INC. VERNON FACILITY, 2700 S. INDIANA AVENUE, VERNON, CALIFORNIA, EPA ID NUMBER CAD 097 854 541

Dear Mr. Marzolino:

The Department of Toxic Substances Control (DTSC) has approved your Class 2 Interim Status (IS) Modification application for Vernon Facility to authorize:

(1) installation of a drop-out box system in the southwest corner of the Central Container Receiving Building (an IS container storage area), which intercepts the flow of storm water from the site and allows sediment, which may contain lead particulates, to drop out of the storm water prior to entering the on-site storm water retention pond. The system includes one 930-gallon stainless steel in-ground sump and four 9,000-gallon above-ground high density cross-link polyethylene resin storage tanks;

(2) the expansion of the facility's existing Reverb Furnace Feed Room from 3,222 cubic yards to 4,379 cubic yards (a footprint area increase of 16,325 square feet to 29,479 square feet), the construction of a connector or corridor between the Reverb and Blast Furnace Feed Rooms, and a truck wash station adjacent to the feed room expansion to further reduce the fugitive emission of lead particulate from the facility;

(3) reduction of storage capacity at the Central Container Receiving Building from 180,060 gallons to 168,978 gallons with a reduced storage area from 12,000 square feet to 10,600 square feet; and

(4) elimination or closure of the Canopied Container Receiving Building that encompasses the area of 5,460 square feet and that has a storage capacity of 77,712 gallons.

The activities set forth above shall be conducted in accordance with the approved Temporary Authorization Application Request for a Class 2 Modification for GNB Technologies Inc. (GNB) Interim Status Facility in Vernon, California, EPA ID No. CAD097854541, dated August 6, 1999.

The announcement of a 60-day comment period to invite the public, community group, and interesting party to be involved in the decision of this Class 2 Modification approval was published in LA Times, and La Opinion in Spanish, on August 18, 1999, and August 20, 1999, respectively. GNB had an informational meeting on September 22,1999.

DTSC prepared and distributed a proposed Negative Declaration (ND) for this Class 2 IS Modification to the State Clearinghouse, Governor's Office of Planning and Research; local agencies; and interesting groups on the facility mailing list on October 5, 1999.

On November 15, 1999, the State Clearinghouse noticed DTSC that at the end of the review period on November 12, 1999, no state agencies submitted comments on the proposed ND. However, there is one comment from the City of Vernon on the proposed Negative Declaration sent to this office on October 26, 1999.

Attached is a copy of letter from the City of Vernon (City), pertaining to the proposed Negative Declaration for the Class 2 IS Modification project. The City requests that GNB submit a detailed operation and site plan explaining how GNB's operation will be expanded. The City will then make a determination regarding whether a conditional use permit will be necessary.

In order to comply with the requirements of the California Environmental Quality Act (CEQA), GNB must submit the requested information to the City of Vernon within thirty (30) days after receipt of the attached Response To Comments. GNB must also send a status report to DTSC within ninety (90) days of the City's determination regarding whether a conditional use permit will be required.

The IS Modification for the GNB Technologies, Inc. Vernon Facility is attached.

If you have any questions, please contact Phil Chandler at (818) 551-2921 or Liang Chiang at (818) 551-2964.

Sincerely,

Jose Kou, P.E., Chief
Southern California Permitting Branch
Hazardous Waste Management Program

Enclosure

Certified Mail
P 529 033 397
Return Receipt Requested

cc: Mr. Philip Chandler
Unit Chief
Southern California Permitting Branch
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

REGIONAL

Mr. David Bacharowski
Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Mr. Marco A. Polo
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, California 91765-4182

MANDATORY

Ms. Liz Allen
Sierra Club
394 Blaisdell
Claremont, California 91711

Ms. Bonnie Holmes
Sierra Club
1414 K Street, Suite 300
Sacramento, California 95814

Mr. David Roe
Environmental Defense Fund
Rockridge Market Mall
5655 College Avenue, Suite 304
Oakland, California 94618

Mr. Mike Belliveau
Communities for a Better Environment
500 Howard Street, Suite 506
San Francisco, California 94105

Ms. Jody Sparks
Toxics Assessment Group
P.O. Box 73620
Davis, California 95617

Ms. Diane Takvorian
Environmental Health Coalition
1717 Kettner Blvd., Ste. 100
San Diego, California 92101

Ms. Ann Coombs
League of Women Voters
65 Avalon Drive
Los Altos, California 94022

Mr. Victor Weisser
California Council for
Environmental & Economic Balance
100 Spear Street, Ste. 805
San Francisco, California 94105

Mr. Bradley Angel
Greenaction
1095 Market Street, Ste 608
San Francisco, California 94103

Ms. Mary Raftery
CALPIRG
926 J Street, Suite 713
Sacramento, California 95814

Ms. Gwendolyn Eng, Regional Representative
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. John Bors
Morrison Knudsen Corporation
1 Market Plaza, Steuart Tower, Ste. 400
San Francisco, California 94105

Ms. Jane Williams
California Community Against Toxics
P.O.Box 845
Rosamond, California 93560

Mr. Chuck White
Waste Management, Inc.
915 L Street, Suite 1430
Sacramento, California 95814

General Counsel
Planning and Conservation League
926 J Street, Suite 612
Sacramento, California 95814

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

Facility:	GNB Technologies, Inc. 2700 South Indiana Street City of Vernon, California 90023	Interim Status Modification
Operator:	GNB Technologies, Inc. 2700 South Indiana Street City of Vernon, California 90023	Modification Effective Date: December 13, 1999

Pursuant to Section 25200.5 of the California Health and Safety Code, and Section 66270.72 of Title 22 of the California Code of Regulations, this Interim Status Modification is granted to GNB Technologies, Inc., subject to the conditions in Attachment A, which is composed of 2 pages, which by this reference is incorporated herein.

Jose Kou, P.E., Chief
Southern California Permitting Branch
Hazardous Waste Management Program

12/13/99
Date

ATTACHMENT A

Modification to Interim Status (IS)

GNB Technologies, Inc. Vernon Facility
2700 South Indiana Street
Los Angeles County
City of Vernon, California 90023-0957

I. GENERAL CONDITIONS:

GNB Technologies, Inc. hereinafter called the owner and/or operator, shall comply with applicable provisions of Chapter 6.5 and Chapter 6.8 of Division 20 of the California Health and Safety Code (H&SC). The owner and/or operator shall also comply with any rule, regulation, permit, covenant, standard, requirement, or order issued, promulgated, or executed thereunder and any amendments, including the applicable requirements for Interim Status Standards for Owners and Operators of Hazardous Waste Transfer, Treatment, Storage, and Disposal Facilities, Chapter 15, Division 4.5, Title 22 of the California Code of Regulations (CCR).

The issuance of this modification to IS does not release the owner and/or operator from any liability or duty imposed by federal or state laws, regulations or local ordinances. The issuance of this modification to IS does not relieve the owner and/or operator from complying with subsequently adopted or amended laws or regulations, administrative orders, or judicial orders which impose requirements which are in addition to or more stringent than those in existence when this modification to IS was issued. The owner and/or operator shall comply with any such additional or more stringent requirements in addition to the requirements and conditions specified in this document. The owner and/or operator shall provide and maintain financial responsibility in accordance with Article 8, Chapter 15, Division 4.5, Title 22 of the CCR.

II. SPECIAL CONDITIONS:

This IS modification authorizes the owner and/or operator to implement the following activities at the Vernon Facility site:

(1) installation of a drop-out box system in the southwest corner of the Central Container Receiving Building (an IS container storage area), which intercepts the flow of storm water from the site and allows sediment, which may contain lead particulates, to drop out of the storm water prior to entering the on-site storm water retention pond. The system includes one 930-gallon stainless steel in-ground sump and four 9,000-gallon above-ground high density cross-link polyethylene resin storage tanks;

(2) expansion of the facility's existing Reverb Furnace Feed Room from 3,222 cubic yards to 4,379 cubic yards (a footprint area increase of 16,325 square feet to 29,479 square feet), the construction of a connector or corridor between the Reverb and Blast Furnace Feed Rooms, and a truck wash station adjacent to the feed room expansion to further reduce the fugitive emission of lead particulate from the facility;

(3) reduction of storage capacity at the Central Container Receiving Building from 180,060 gallons to 168,978 gallons with a reduced storage area from 12,000 square feet to 10,600 square feet; and

(4) elimination or closure of the Canopied Container Receiving Building that encompasses the area of 5,460 square feet and that has a storage capacity of 77,712 gallons.

The activities set forth in this section shall be conducted in accordance with the approved Temporary Authorization Application Request for a Class 2 Modification for GNB Technologies Inc. Interim Status Facility in Vernon, California, EPA ID No. CAD097854541, dated August 6, 1999.

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

NOTICE OF DETERMINATION

To: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

From: Department of Toxic Substances Control
Office of Program Audits and Environmental Analysis
400 P Street, Fourth floor, room 4310
P.O. Box 806
Sacramento, CA 95812-0806

Project Title: GNB TECHNOLOGIES, INC. VERNON FACILITY, CLASS 2 INTERIM STATUS MODIFICATION, EPA I.D. NUMBER: CAD 097 854 541

State Clearinghouse Number: 99101056

Contact Person and Telephone: Liang C. Chiang (818) 551-2964

Project Location: 2700 South Indiana Street
City of Vernon, California 90023-0957

Project Description: This project is a Class 2 Interim Status (IS) Modification to allow GNB Technologies, Inc. Vernon Facility to install a drop-out box system and implement a supplemental environmental project, referred to as the corridor project, to enclose dust generating activities.

Date project approved: December 13, 1999

This Notice of Determination is filed in compliance with Section 21108 of the Public Resources Code. The Department of Toxic Substances Control (DTSC), as lead agency, has approved the above described project and the attached Negative Declaration.

DTSC has made the determination that the project will not have a significant effect on the environment. The attached Negative Declaration was prepared for this project pursuant to the provisions of the California Environmental Quality Act.

A copy of this Negative Declaration may be examined at the above address of DTSC.

Signature: _____ Date: 12/13/99
Date received for filing at OPR:

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

NEGATIVE DECLARATION APPROVAL

Project Title: GNB TECHNOLOGIES, INC. VERNON FACILITY CLASS 2 INTERIM STATUS MODIFICATION

State Clearinghouse Number: 99101056

Contact Person and Telephone: Liang C. Chiang (818) 551-2964

Project Location: 2700 South Indiana Street
City of Vernon, California 90023-0957

Project Description: This project is a Class 2 Interim Status (IS) Modification to allow GNB Technologies, Inc. Vernon Facility to install a drop-out box system and implement the supplemental environmental project, referred to as the corridor project, to enclose dust generating activities.

The public review/comment period for the proposed Class 2 IS Modification project began on August 18,1999, and ended on October 18, 1999. The draft Negative Declaration public notice began on October 5, 1999, and ended on November 12, 1999. The notice was published in local newspapers "Times Orange County" in English, and La Opinion in Spanish language, in order to invite the public and the community to be involved in the final decision for this project. One comments on the draft Negative Declaration was received during the public comment period. A Response To Comments was prepared.

The Department of Toxic Substances Control has found, on the basis of the Initial Study and comments received on the draft Negative Declaration, that there is no substantial evidence that this project will have a significant effect on the environment.

I hereby approve the Negative Declaration for this project.

Signature: _____ Date: 12/13/99

Jose Kou, Chief
Southern California Permitting Branch
Hazardous Waste Management Program
Department of Toxic Substances Control

Department of Toxic Substances Control

Edwin F. Lowry, Director
400 P Street, 4th Floor, P.O. Box 806
Sacramento, California 95812-0806

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

December 13, 1999

FINAL NEGATIVE DECLARATION
FOR
APPROVAL OF A CLASS 2 INTERIM STATUS MODIFICATION
AT
GNB TECHNOLOGIES, INC. VERNON FACILITY

Project Proponent

GNB Technologies, Inc.
2700 South Indiana Street
Vernon, California 90023

Contact Person:

James Marzolino
2700 South Indiana Street
Vernon, California 90023
(323) 262- 1101

Project Description

GNB Technologies, Inc. (GNB), has submitted a request to the Department of Toxic Substances Control (DTSC) for approval of an Interim Status (IS) Modification pursuant to Title 22, California Code of Regulations, Article 4, §66270.42(e). This request for a modification of the GNB IS facility has been determined by the DTSC to be a Class 2 modification. The following changes to the facility are included in the IS Modification request:

1) Installation of a Drop-out System to prevent sediment from entering and accumulating in the existing storm water pond; and

2) Implementation of a Supplemental Environmental Project (SEP) which will consist of:

   a) expanding the size of and enclosing the existing Reverberatory Furnace Feed Room Building (Reverb Feed Room) which will result in increased storage of recyclable material in an enclosed building while minimizing the

necessity to store whole batteries in the Container Receiving Building and, thus, minimize the potential for fugitive emissions;

b) construction of an enclosed corridor between the reconfigured Reverb Feed Room and the Blast Furnace Room to minimize the generation of fugitive emissions; and

c) installation of a Truck Wash Sump to prevent the tracking of materials and release of fugitive emissions from the Feed Rooms due to vehicles leaving the building.

Facility Location

Located at 2700 South Indiana Street, the GNB facility is in the southern portion of Los Angeles County in the City of Vernon. Vernon has been developed as a city zoned for manufacturing, commercial, industrial, warehousing, slaughtering, and rendering uses. The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The GNB facility is compatible with this zoning designation.

Mitigation Measures

The DTSC has determined that the project does not require any mitigation measures beyond those incorporated as part of the project.

Findings of Significant Effect on the Environment

The DTSC has determined that the project will not have a significant effect on the environment as that term is defined in the Public Resources Code Section 21068.

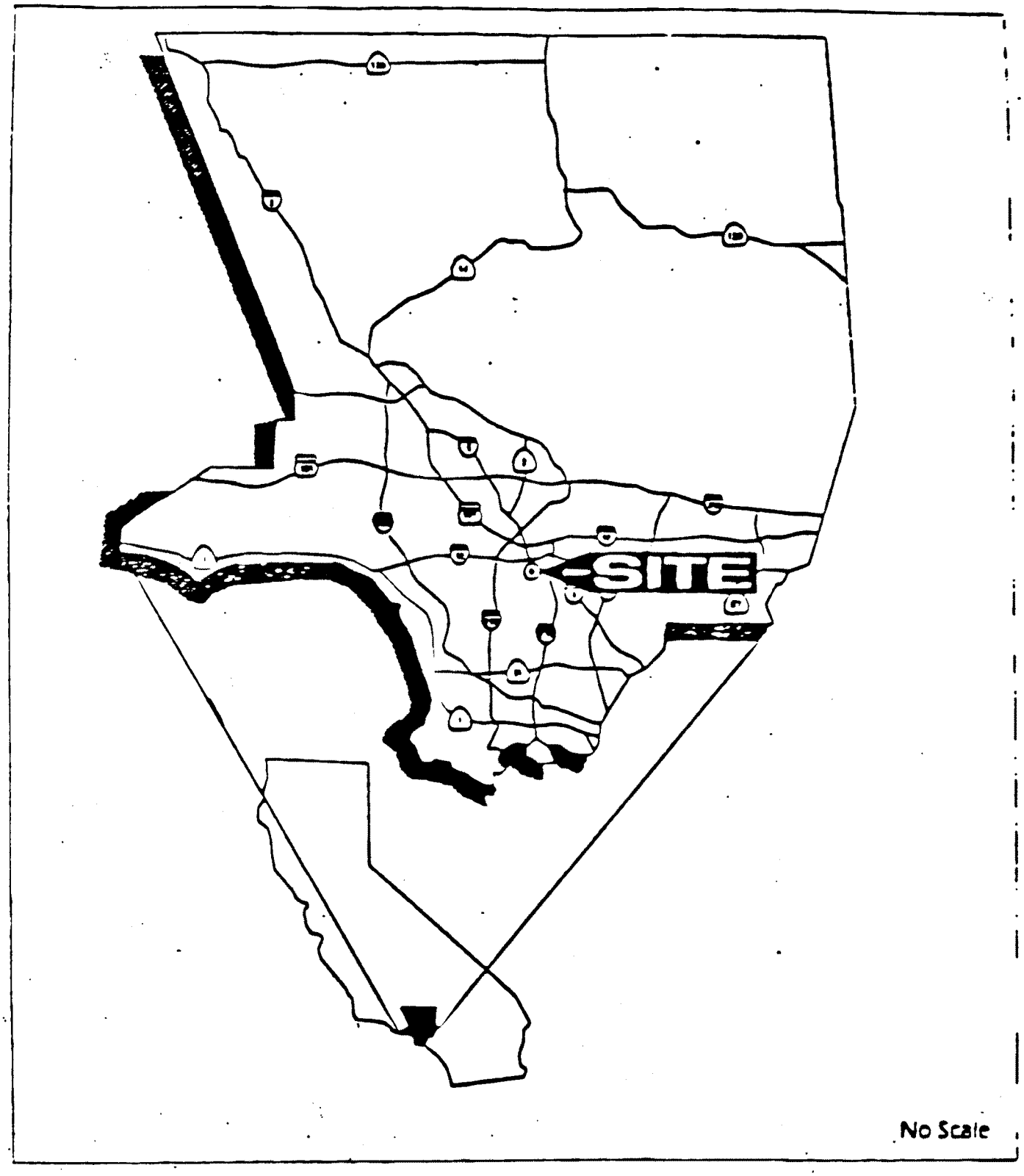
A copy of the Initial Study which supports this finding is attached.

Signature Liang Chiang Date 12/9/99

Liang C. Chiang, P.E.
Southern California Permitting Branch,
Department of Toxic Substances Control

Signature Jose Kou Date 12/13/99

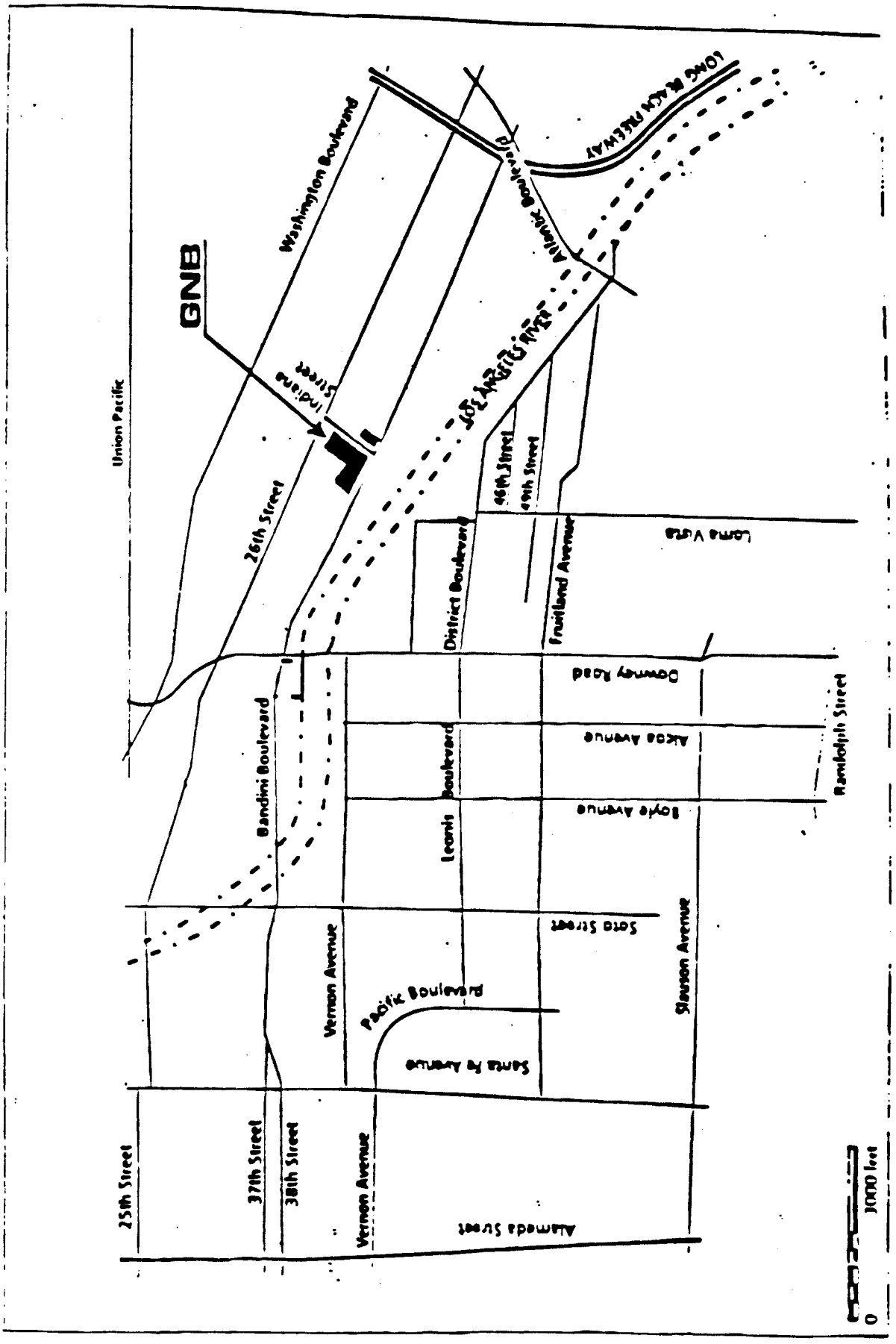
Jose Kou, P. E.; Branch Chief
Southern California Permitting Branch,
Department of Toxic Substances Control



REGIONAL MAP

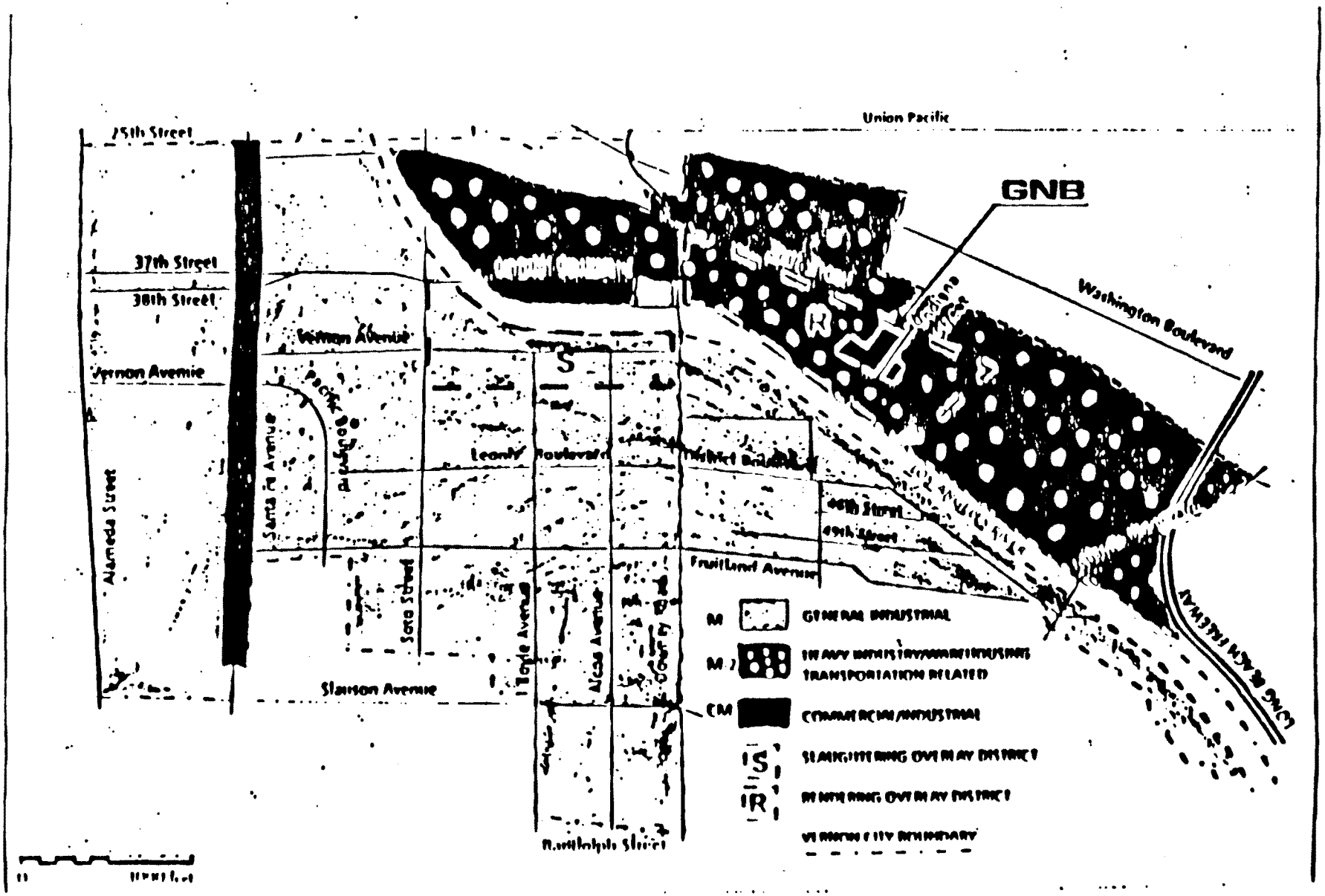
LOS ANGELES COUNTY

Figure 1



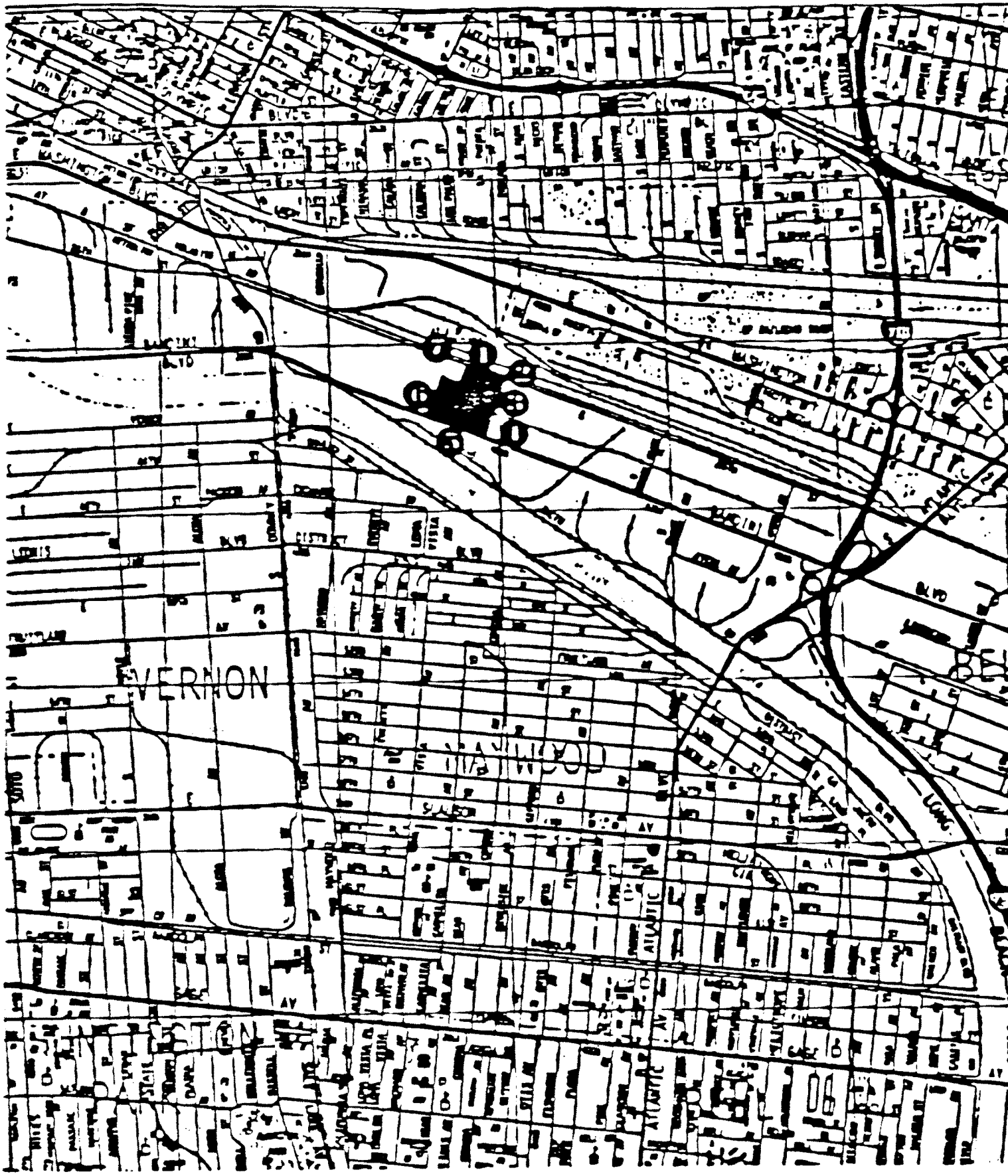
SITE LOCATION
GNB, INC.

Figure 2



COMPREHENSIVE ZONING MAP
CITY OF VERNON

Figure 3



GNB, INC.

NOISE SAMPLING LOCATIONS

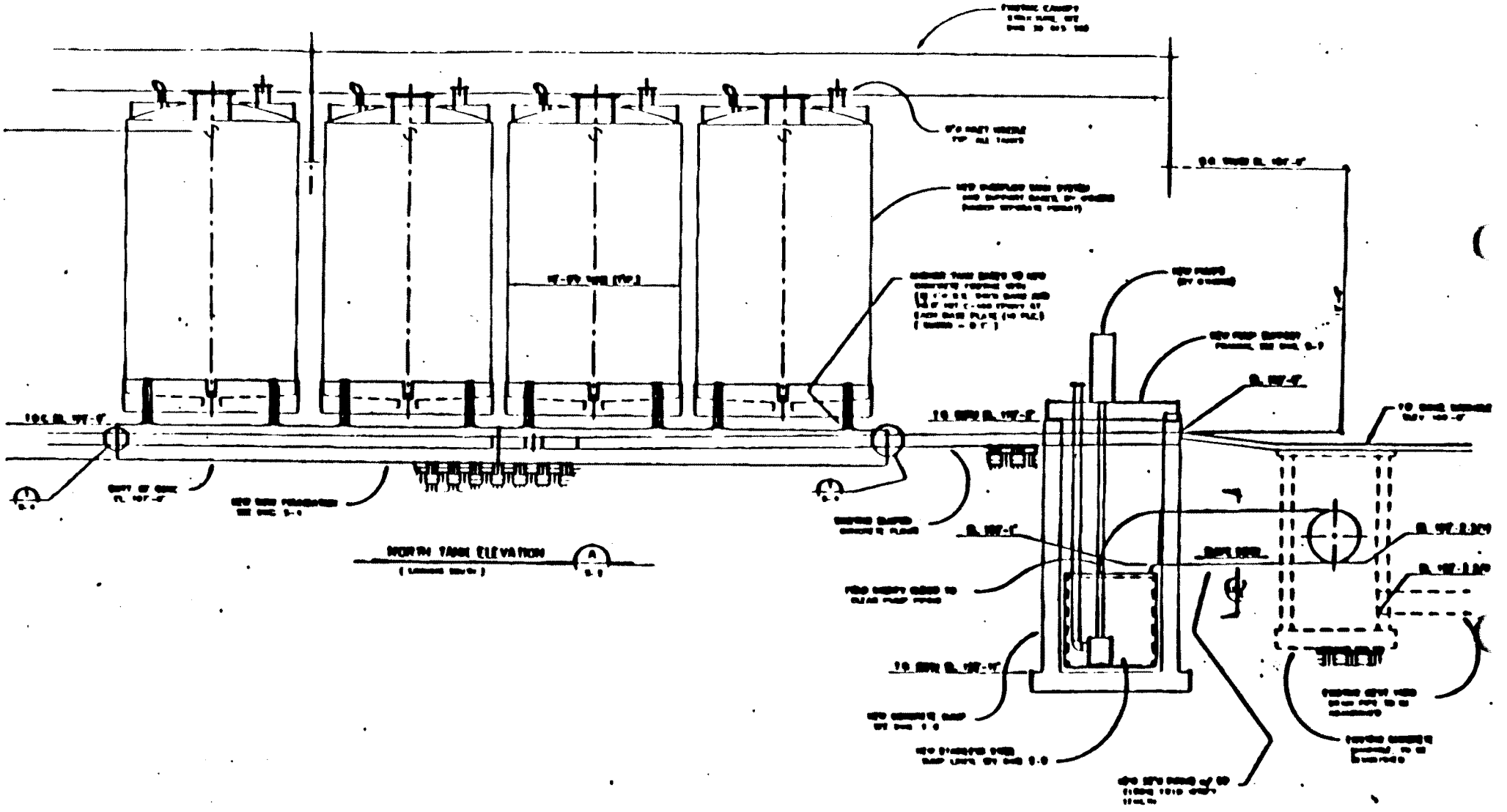


Figure 5

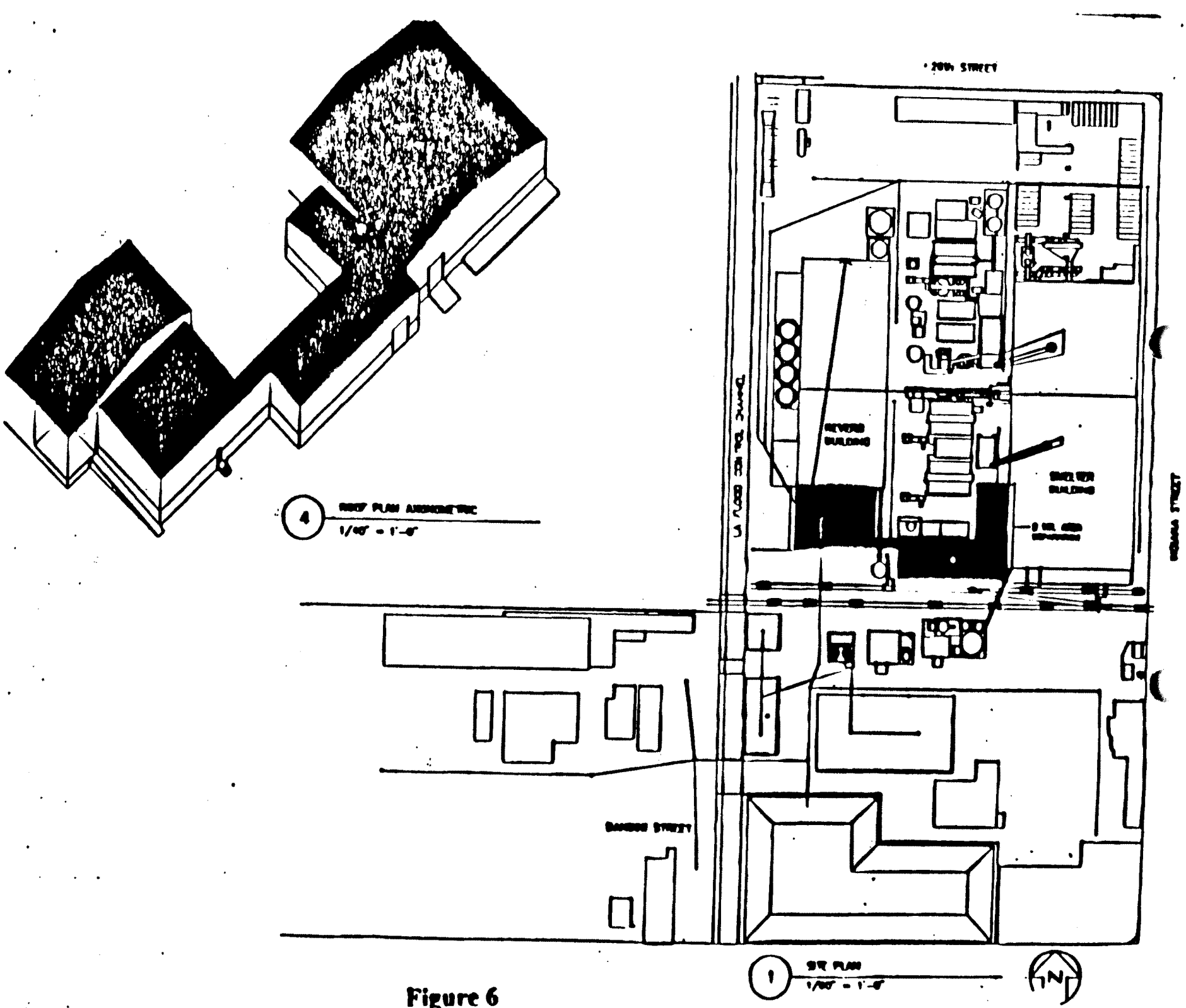


Figure 6

Cal/EPA Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 90201
TEL: (818) 551-2800

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
For
APPROVAL OF A CLASS 2 INTERIM STATUS MODIFICATION
FOR
GNB TECHNOLOGIES, INC. VERNON FACILITY

The Department of Toxic Substances Control has completed the following Initial Study for this project in accordance with the California Environmental Quality Act (§ 21000 et seq., California Public Resources Code) and implementing Guidelines (§ 15000 et seq., Title 14, California Code of Regulations).

I. PROJECT INFORMATION:

Project Name: GNB Technologies, Inc.

Site Location: 2700 South Indiana Street
Vernon, California 90023

Contact Person: James Marzolino
Address: 2700 South Indiana Street
Vernon, California
Phone Number: (323)262-1101

Project Description:

GNB Technologies, Inc. (GNB) submitted a request to the Department of Toxic Substances Control (DTSC) for approval of an Interim Status (IS) Modification pursuant to Title 22, California Code of Regulations (CCR), Article 4, §66270.42(e). This request for a modification of the GNB Interim Status has been determined by the DTSC to be a Class 2 modification. Included in the IS Modification request are the following facility changes:

1) Installation of a Drop-out System to prevent sediment from entering and accumulating in the existing storm water pond; and

2) Implementation of Supplemental Environmental Projects (SEPs) which consists of:

   a) expanding the size of and enclosing the existing Reverberatory Furnace Feed Room Building (Reverb Feed Room) which will result in increased storage of recyclable material in an enclosed building while minimizing the necessity to store whole batteries in the Container Receiving Building and, thus, minimize the potential for fugitive emissions;

Cal/EPA Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 90201
TEL: (818) 551-2800

b) construction of an enclosed corridor between the reconfigured Reverb Feed Room and the Blast Furnace Room to minimize the generation of fugitive emissions; and

c) installation of a Truck Wash Sump to prevent the tracking of materials and release of fugitive emissions from the Feed Rooms due to vehicles leaving the building.

The specific activities involved in the installation of the Drop-out System and the SEPs are described below:

Drop-out System:

Activities associated with the installation of the Drop-out System will consist of:

1) Demolition, excavation, testing and profiling, and disposal of a 20-foot by 70-foot by 1 foot section of an existing concrete pad, totaling approximately 50 cubic yards;

2) Excavation, testing and profiling, and disposal of approximately 100 cubic yards of soils;

3) Construction of a 20- by 70-foot, 24-inch thick reinforced concrete pad with tank foundations. A 16 inch high by 16 inch wide reinforced steel concrete berm will be constructed around the boundary to provide secondary containment;

4) Construction of a concrete vault with a 12-inch thick, reinforced steel concrete wall to a depth of 15 feet, within which will be placed a 930 gallon stainless steel tank which will serve as a liner;

5) Installation of a 10-foot section of 36-inch diameter double walled underground drain pipe connector to the existing underground drain pipe located at the manhole drainage sump. This section of pipe will connect to the concrete vault/ storage sump liner;

6) Installation of four 9,000-gallon each capacity (36,000 gallon total) above-ground settling tanks;

7) Installation of three sump pumps (100, 500 and 1,000 gallons per minute) in the storage sump;

8) Installation of all above-ground piping associated with the installation of the Drop-out System, four settling tanks and three sump pumps; and

9) Installation of new utilities and tie-ins to the existing utilities.

Cal/EPA Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 90201
TEL: (818) 551-2800

Supplemental Environmental Projects (SEPs):

Activities associated with the SEPs consist of:

Corridor:

1) Dismantling of an existing 1,125-square foot sheet metal building;

2) Demolition of pavement/concrete (approximately 450 cubic yards) to allow for the construction of the footings, foundations, floor system and truck ramp/storage bin within the existing Blast Furnace Feed Room;

3) Demolition of a concrete dock located west of the existing Blast Furnace Feed Room (100 cubic yards);

4) Excavation of soils 4-foot wide by 700-foot long to a depth of 2-foot (approximately 200 cubic yards) for footings and foundations. Over-excavation may be required, contingent on results of soil samples analyses;

5) Sampling, testing and profiling of demolition and excavated materials prior to disposal or reuse;

6) Construction of rebar-reinforced concrete footings, foundations (for building, framing and enclosure) and floor systems (1,700 total cubic yards of concrete);

7) Construction of the Reverb Furnace Feed Room expansion and installation of a liner system consisting of a 60-mil HDPE Geomembrane;

8) Construction of an enclosed corridor building;

9) Installation of additional ventilation with 100,000 cubic feet per minute capacity added to the existing ventilation system;

10) Construction of a concrete ramp and storage bin within the Blast Furnace Feed Room; and

11) Installation of new utilities and tie-ins to the existing utilities;

Truck Wash Sump:

1) Demolition of approximately 10 cubic yards of pavement/concrete;

2) Excavation of approximately 80 cubic yards of soils;

3) Sampling, testing and profiling of demolished and excavated materials prior to

disposal or reuse;

4) Construction and installation of a 571 cubic feet (4,277 gallon capacity) reinforced concrete Truck Wash sump with secondary containment and leak detection system. The dimensions of the sump will be 30-foot by 9-foot. The walls of the sump will be 12-inch thick. The sump will range in depth from 1.67-foot to 2.8-foot below ground surface; and

5) Installation of a liner system consisting of a 60-Mmill HDPE Geomembrane.

PROJECT ACTIVITIES:

A total of approximately 390 cubic yards of soils and approximately 625 cubic yards of concrete and/or pavement are planned for excavation and demolition, respectively, for all activities of this project. Samples will be taken of all excavated soils and pavement/concrete during project activities. These samples will be tested and profiled for contamination before final disposition of excavated materials.

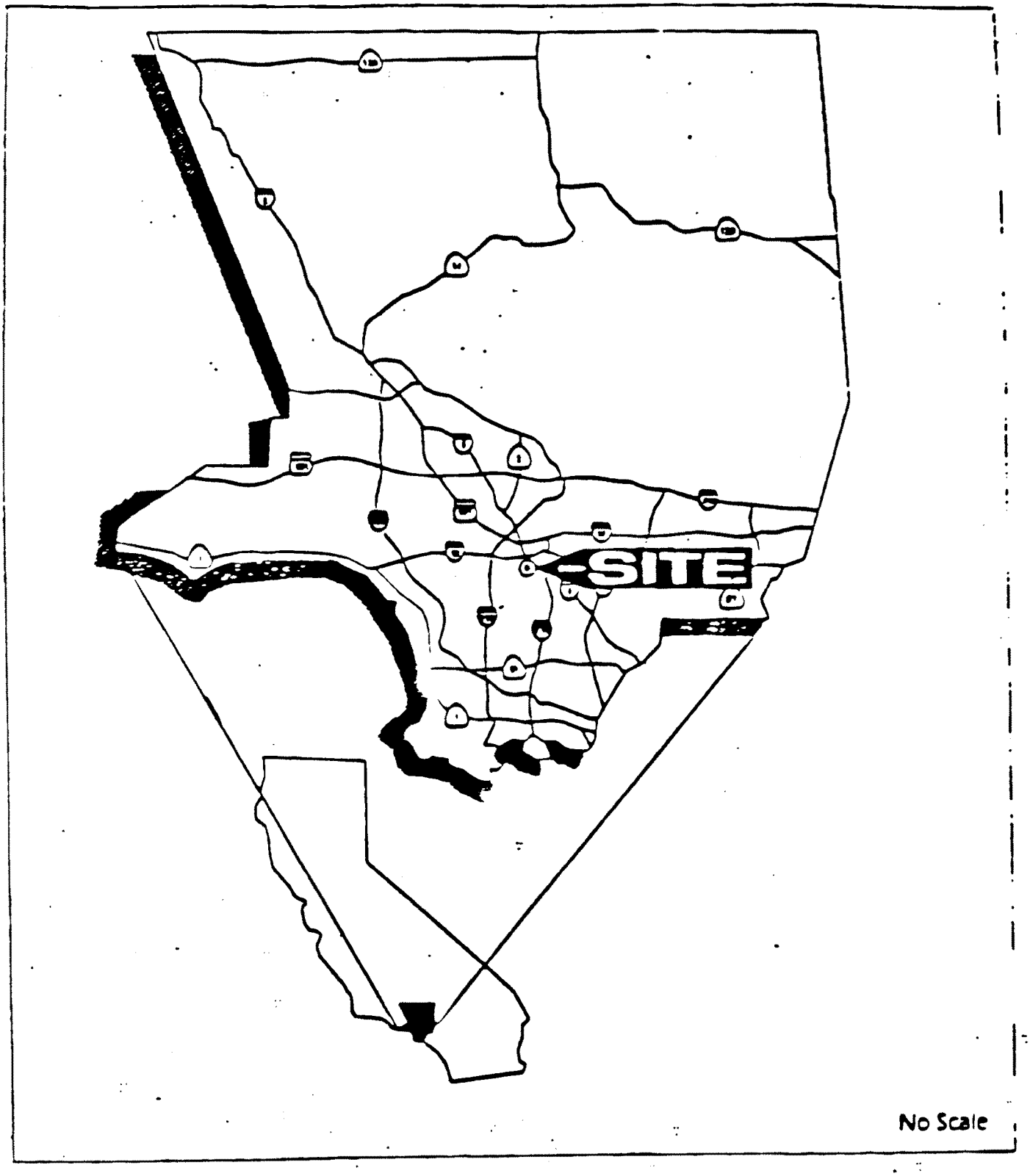
Perimeter fence monitoring will be established to track any release of airborne particulates and contaminants generated during demolition and excavation activities. As a result of excavation and demolition activities, it may be necessary to provide project work area containment to prevent the release of airborne dust. All perimeter fence monitoring will be implemented pursuant to an approved DTSC schedule. All excavated soils will be placed in lined containers on-site and, unless actively filling containers, containers must be covered at all times to prevent fugitive dust from leaving the facility site.

All hazardous waste, contaminated soils and demolished concrete/pavement materials will be transported by a certified/licensed hazardous waste hauler to a permitted disposal facility. Federal Department of Transportation (DOT) approved trucks will be used to transport excavated soils, concrete and/or pavement and shall be currently registered with the DTSC for transporting hazardous wastes. Containerized loads will be lined and will be covered at all times to prevent fugitive dust emissions. Any remaining non-contaminated soils will be used for backfill or transported off-site for final deposition.

All equipment used in the demolition and excavation phases of this project will be decontaminated daily at the conclusion of all project activities as specified pursuant to CCR, Article 7, §66264.114. All construction activities will be performed in strict compliance with the latest revision of the Uniform Building Code and any other pertinent codes and/or regulations as set forth by the City of Vernon, Department of Building and Safety.

Drop-out System:

Project activities associated with the Drop-out System are anticipated to last approximately 18 weeks from project implementation to completion. Duration of excavation and demolition will be approximately 2 weeks. Construction equipment (i.e. vehicles) to be used for this project include one

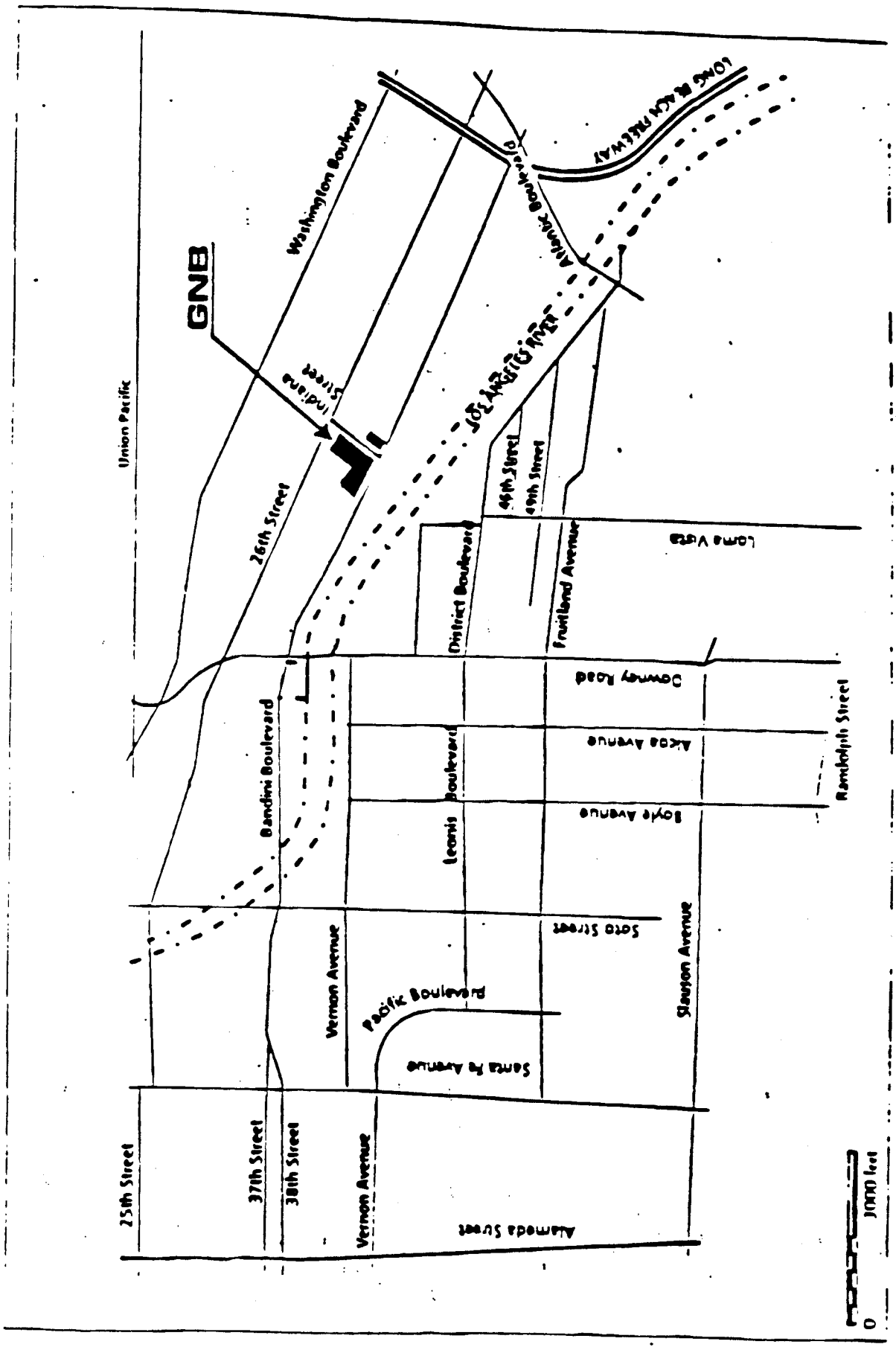


N

REGIONAL MAP

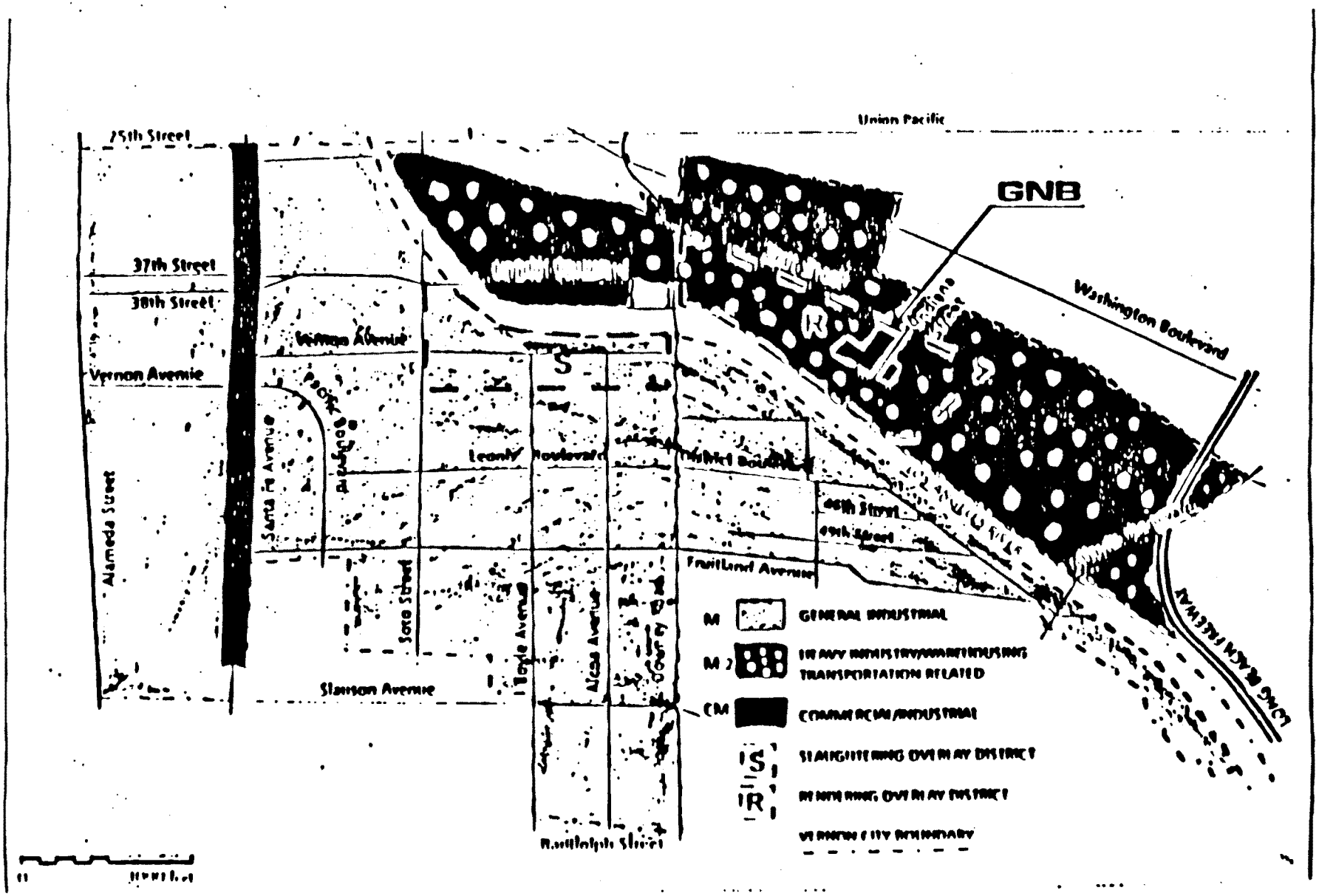
LOS ANGELES COUNTY

Figure 1



SITE LOCATION
GNB, INC.

Figure 2



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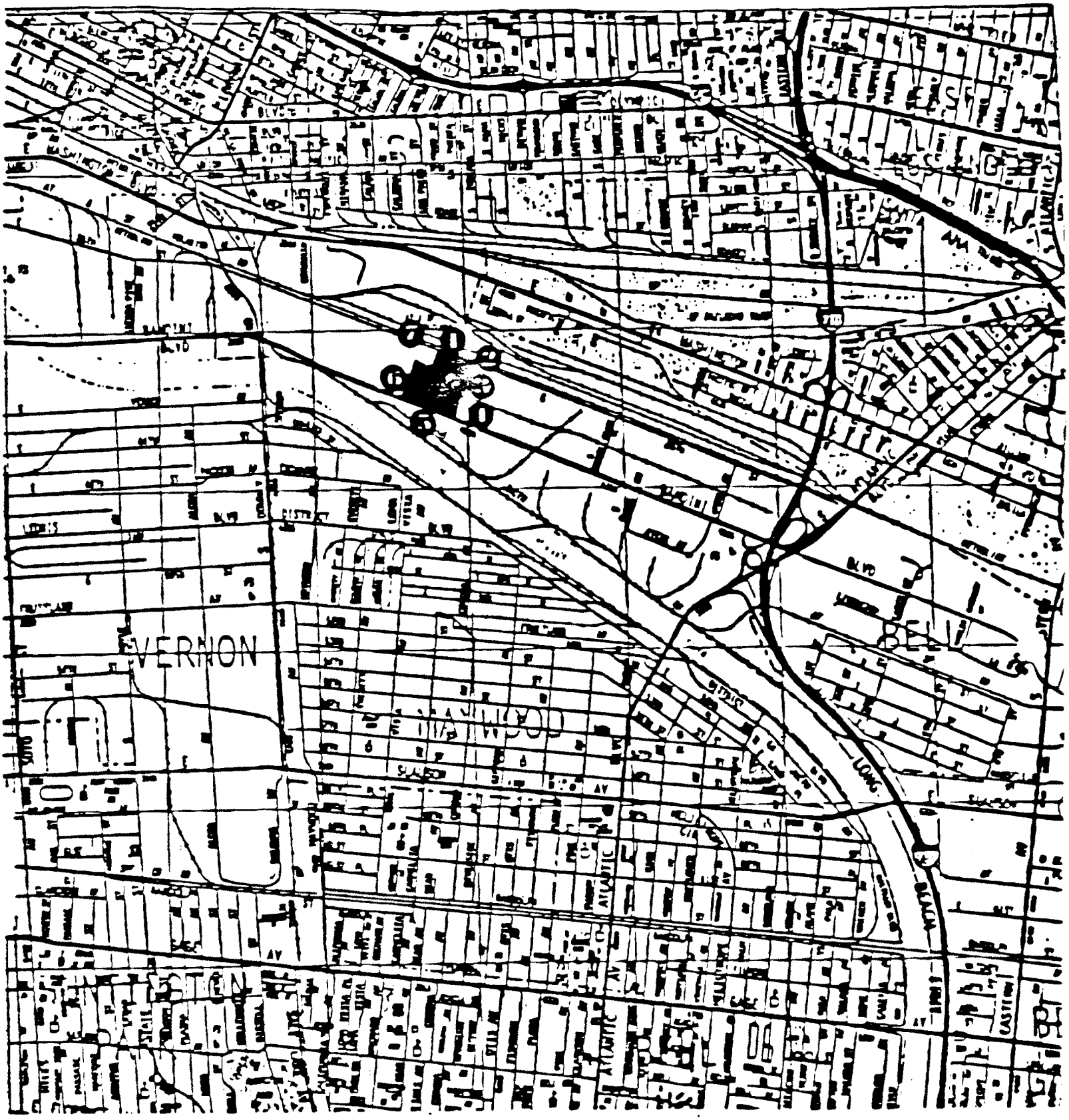
COMPREHENSIVE ZONING MAP
CITY OF VERNON

Figure 3



GNB, INC.
NOISE SAMPLING LOCATIONS

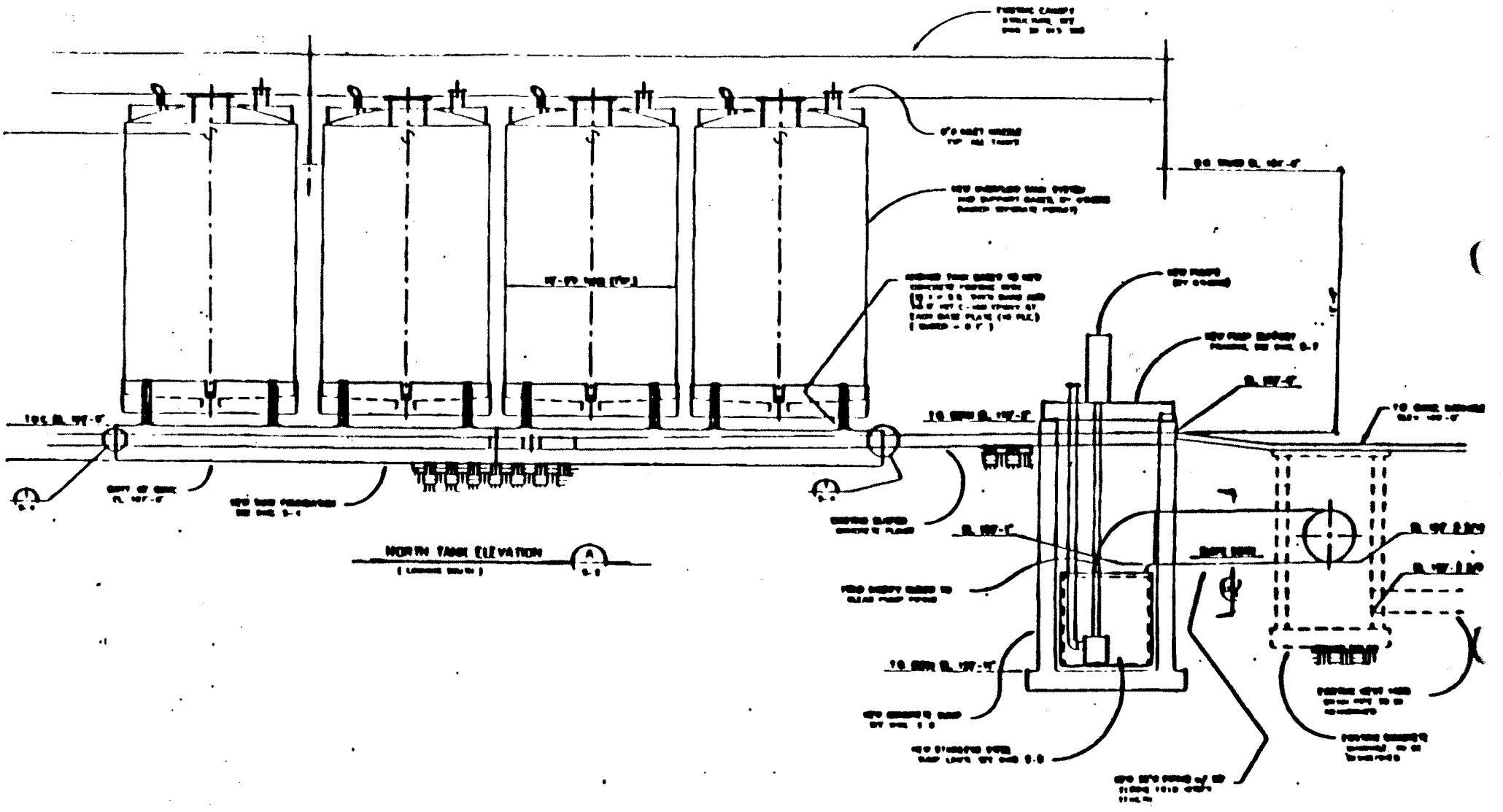


Figure 5

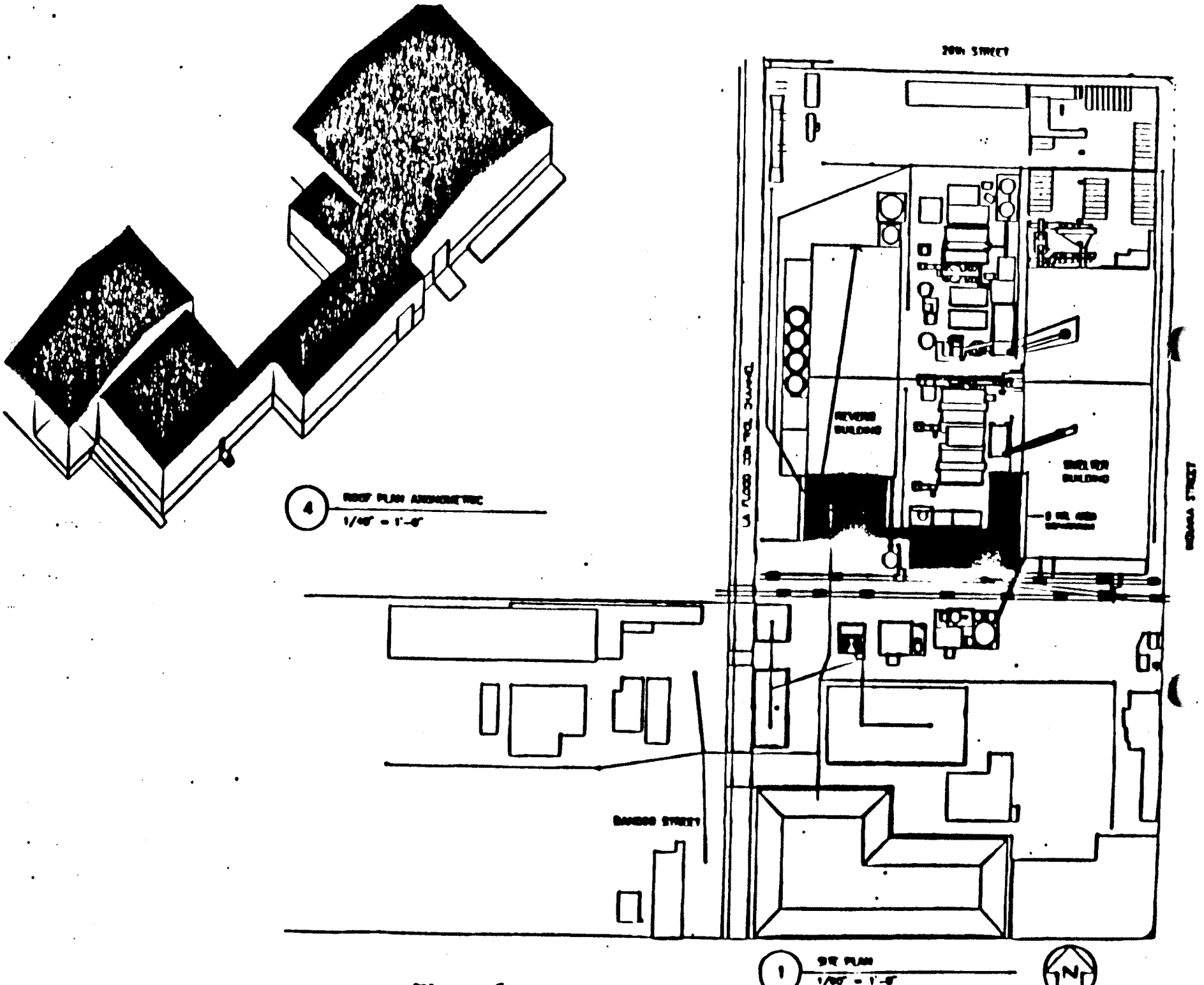


Figure 6

backhoe primarily for excavation soils and demolition of pavement and concrete.

Approximately 150 cubic yards of soil and concrete/pavement will be excavated before installation of the Drop-out Box System requiring 15-20 trucks to transport materials. Actual transport of these materials will be dependent on when sampling and profiling results are completed.

The volume of concrete necessary to complete the 20-foot by 70-foot concrete pad, tank foundations and footings is estimated to be about 100 cubic yards requiring a total of approximately 10-12 concrete truck deliveries to the site. The forming and pouring of foundations, pit and berm will take approximately 2.5 weeks. Deliveries by concrete trucks will be scheduled to reduce extended truck delivery times and eliminate unnecessary traffic impacts. Duration of the concrete deliveries will be short and temporary lasting no more than one or two days.

The four settling tanks will have a total maximum permitted storage capacity of 36,000 gallons and will be constructed of high density crosslink polyethylene (XLPE) resin. Each tank will be 10-foot in diameter and 17-foot high (not including tank stand). The tanks will be elevated on support structures which will be supported on reinforced concrete foundations.

The secondary containment vault for the stainless steel liner will be constructed of concrete at a depth of approximately 15 feet. The dimensions of the vault will measure 10-foot wide by 14-foot long by 15-foot deep. The existing manhole sump drain pipe will be connected to the newly constructed secondary containment vault. A leak detection probe system will be placed between the vault and the stainless steel liner.

A 16-inch high steel reinforced concrete berm will be constructed around the boundary of the concrete pad which will be used for the Drop-out Box System.

Drop-out Box System Process: The wash-down water and storm water management system discharges which are collected at various points across the site and will convey to the newly constructed Drop-out Box instead of directly flow into the retention pond. The Drop-out settling tanks will receive the collected water pumped from the Drop-out Sump. In the settling tanks, solids will be removed by gravity separation and will collect at the bottom of the tank. The process is the same for all four settling tanks. After separation of particulates, water from each of the four tanks will flow into the double-lined, leak-detected storm water retention pond through four 8-inch diameter overflow pipes (one pipe for each tank). It is expected that the water stream will leave the drop-out system and enter the retention pond only during heavy storm events. Solids collected in the bottom of the settling tanks, along with the water contained in the tank, will be removed from the tanks and be pumped to the on-site wastewater treatment plant for processing. A profile diadram of the settling tanks and the overflow pipe are indicated in attached Figure 5.

Corridor and Truck Wash Sump:

The Corridor (see Figure 6) is scheduled for completion within 8 months from initiation of project activities and will involve a phased activity schedule for project completion. The demolition and

excavation phase will be completed in approximately 3 weeks. Construction of the corridor footings, floor and sump is scheduled for completion within a 6 week period. Building construction and installation of all necessary appurtenances associated with the SEPs will involve 4 months of activity within the 8-month project completion timeframe.

The demolition and excavation phase will require the removal of approximately 865 cubic yards of excavated materials. These excavated materials include approximately 290 cubic yards of soils and about 575 cubic yards of concrete and pavement demolition material. A small amount of building/structure demolition materials (approximately 40 cubic yards) will be sampled and profiled and disposed of appropriately.

An estimated total of 1,600 cubic yards of concrete will be used to construct flooring, footings, containment walls and Truck Wash Sump. A double-lined leak detection system will be installed prior to installation of the floor and sump.

The sump will be structurally designed to withstand the weight of trucks and/or service vehicles that will enter and exit either the Blast or Reverb Furnace Feed Rooms. Cast iron steel grates (3 ½ inches thick) will be placed upon 1-foot thick, epoxy coated concrete support walls, and will allow wash water to enter into the sump. The sump will be constructed of 1-foot thick reinforced concrete that will be coated with three layers of Novalac epoxy (or equivalent).

Construction of the corridor building also includes a modification to the existing facility ventilation system. The newly modified structures will include ventilation capacity to provide for negative pressure within the building to prevent the release of fugitive emissions from the building openings. This new air pollution control system, approved by SCAQMD, consists of a dust collection system rated at 100,000 cubic feet per minute and will be vented to a new baghouse.

FACILITY HISTORY AND ENVIRONMENTAL IMPROVEMENTS:

The construction of the Reverb Furnace Feed Room (corridor) is necessary to fulfill an obligation as set forth in a Consent Judgment between GNB and DTSC. In the Consent Judgment, GNB committed to expend $748,000 to implement certain Supplemental Environmental Projects (SEP) as approved by DTSC. The SEPs GNB committed to implement include: 1) construction of an expansion to the existing Reverb Furnace Feed Room; 2) construction of a connector or corridor between the Reverb and Blast Furnace Feed Rooms; and 3) construction of a Truck Wash Sump/Station adjacent to the Blast Furnace Feed Room.

The proposed construction will provide better management of incoming recyclable materials by reducing the quantity of material stored within the permitted Container Storage Areas. Construction of the corridor will also serve to reduce emissions of particulates and will also provide a more suitable method of minimizing potential impacts from material (tracking within the facility) to the environment with the protected movement of equipment between the two Feed Rooms.

The installation of the Drop-out Box System will improve the containment and treatment of on-site

surface run-off to prevent the lead-bear sediments deposit in the retention pond, and provide additional environmental benefit to the facility. This aspect of the project, although not required by the Consent Judgment is considered by both DTSC and GNB to be a significant improvement to the overall management of surface water run-off at the facility.

GNB will be proposing to upgrade the existing wastewater treatment plant and secondary containment to ensure adequate secondary containment for all permitted tanks and to centralize wastewater treatment in a single location. The proposed system will be installed at the existing wastewater treatment system location and will replace and enlarge the existing system. This proposed modification to the facility will require the closure of several existing ISD permitted tank units which will be replaced by the new system. The environmental impacts associated with activities involved with construction and implementation of the wastewater treatment plant and secondary containment will be addressed under a separate CEQA analysis at the time the ISD Modification request is submitted and accepted as complete by DTSC.

Agencies Having Jurisdiction Over the Project/ Types of Permits Required:

South Coast Air Quality Management District/ Facility Permit to Operate.
City of Vernon/ Building Permits.

II. DISCRETIONARY APPROVAL ACTION BEING CONSIDERED BY DTSC

- ☐ Initial Permit Issuance
- ☐ Permit Renewal
- ☐ Permit Modification
- ☐ Closure Plan
- ☐ Regulations
- ☐ Removal Action Plan
- ☐ Removal Action Workplan
- ☐ Interim Removal
- ■ Other (Specify)
  Class 2 IS Modification

Program/ Region Approving Project:

Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch

Contact Person/ Address/ Phone Number:

Liang Chiang, P.E.
Department of Toxic Substances Control
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, CA 91201
TEL: (818) 551-2964

Cal/EPA Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch
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Glendale, California 90201
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III. ENVIRONMENTAL CONDITIONS POTENTIALLY AFFECTED:

The boxes checked below identify environmental factors which were found in the following ENVIRONMENTAL SETTING/IMPACT ANALYSIS section to be potentially affected by this project, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigated".

☐ Earth	☐ Risk of Upset	☐ Aesthetics
☐ Air	☐ Transportation/ Circulation	☐ Cultural/ Paleontological Resources
☐ Surface and Groundwater	☐ Public Services	☐ Cumulative Effects
☐ Plant Life	☐ Energy	☐ Population
☐ Animal Life	☐ Utilities	☐ Housing
☐ Land Use	☐ Noise	☐ Recreation
☐ Natural Resources	☐ Public Health and Safety	■ None Identified

IV. ENVIRONMENTAL SETTING/ IMPACT ANALYSIS:

The following pages provide a brief description of the physical environmental conditions which exist within the area affected by the proposed project and an analysis of whether or not those conditions will be potentially impacted by the proposed project. Preparation of the Environmental Setting and Impact Analysis sections follows guidance provided in the DTSC's Workbook For Conducting Initial Studies Under the California Environmental Quality Act (CEQA), October 1996 (Workbook). A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each environmental factor discussed below.

Mitigation measures which are made a part of the project (e.g: permit condition) or which are required under a separate Mitigation Monitoring Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each environmental factor.

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1. Land Use (Workbook; page 24)

Description of Environmental Setting:

The GNB facility is located in the southern portion of Los Angeles County in the City of Vernon (See Figure 1 and 2). The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/ warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants; fertilizer plants and junk/salvage yards (See Figure 3). The GNB site is buffered by other industrial areas from the nearest residential uses which are about 0.75 miles away from the facility. The facility is bounded to the north by East 26th Street and the Atchison, Topeka and Santa Fe Railroad Yard; to the south by Bandini Boulevard; to the east by Indiana Avenue; and to the west by Pioneer Aluminum.

Ref: RCRA Facility Assessment, 1990.
City of Vernon, General Plan, 1992.

Analysis of Potential Impacts:

The proposed project does not alter present or planned land uses. Excavation and construction activities planned will not change the pattern, scale, or character of the general vicinity. Construction is on the existing facility site and will consist of like-materials and have the same architectural elevation as existing structures on site. Project activities are consistent with and are compatible with existing land uses. Therefore, the project will have no impact on current land use.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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2. Earth (Workbook; page 11)

Description of Environmental Setting:

The GNB site is covered by impervious surfaces including asphalt, concrete, buildings and their foundations. Lead recycling and smeltering activities have been conducted at the site since 1922. The original grading of the site occurred prior to 1922 to provide a flat surface for facility operations.

The general topography of the Vernon area is flat with no major hills or areas with elevated topography. No unique geological resources (paleontological resources or unique outcrops) are present at the site or in the general Vernon area that could be disturbed by the continued operation of the facility or the construction of the proposed modifications.

The GNB facility is located in the seismically active area of Southern California. No faults or fault-related features are known to exist on-site. The site is not located in an Alquist-Priolo Special Studies Zone and is not expected to be subject to significant surface fault displacement. There are no other known geological hazards at the GNB site or in the Vernon area including landslides or mudslides because the topography of the area is flat.

The historic operation and past activities at the site have led to soil contamination as documented in the Resource Conservation and Recovery Act (RCRA) Facility Assessment (DTSC, 1990). GNB has been required to conduct a RCRA Facility Investigation to provide a more accurate evaluation of the type, extent, and potential sources of contamination at the site. GNB has submitted the work plan for the RCRA Facility Investigation to DTSC for review and approval.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Project activities include minor excavation and demolition of asphalt and concrete and a minimal amount of soil excavation for placement of footings and sump associated with the corridor building construction and placement of the Drop-out box system. These activities would result in a minimal degree of soil disturbance of a short-term nature. Further, since the site is located in a developed, industrialized area with what can be described as flat surface relief features and due to the limited nature of excavation and demolition activities, it is not anticipated that the project will destruct, cover or modify any geologic or physical features, nor are project activities expected to result in unstable earth conditions, change geologic substructures, create a change in topography or ground surface relief features or alter ground contours during construction, operation, dismantling, excavation, or grading. As such, project activities will have a less-than-significant impact on the geologic and physical features of the topography.

Standard construction practices will be utilized including the requirement to water active construction sites at least twice daily to minimize the potential for wind erosion and the possibility of the

generation of fugitive dust. Implementation. The minimal amount of soil excavation and the short duration of excavation activities will reduce the likelihood of potential erosion, resulting in the project having a less-than-significant impact on earth.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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3. Air (Workbook; page 13)

Description of Environmental Setting:

The GNB facility is located in the South Coast Air Basin (Basin) which lies within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). GNB is currently operating under permits from the SCAQMD. The Basin is a coastal plain with a rim of mountains rising up to 11,000 feet. The area lies within the semi-permanent high pressure zone of the eastern Pacific. This climate generally is characterized by sparse winter rainfall and hot summers tempered by cooling ocean breezes. A temperature inversion which traps the cool marine air layer and prevents vertical mixing is the prime factor that allows air contaminants to accumulate in the Basin. The mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds. The climate of the area is not unique but the high concentration of mobile and stationary sources of air contaminants in the western portion of the Basin in addition to the mountains which surround the perimeter of the Basin, impacts the air quality of the region.

The annual average temperature varies little throughout the Basin, averaging 75 degrees Fahrenheit. Temperature affects the air quality of the region in several ways. Local winds are the result of temperature differences between the relatively stable ocean air and the uneven heating and cooling that takes place in the Basin due to a wide variation in topography. Temperature also has a major effect on vertical mixing height and affects chemical and photochemical reaction times.

Winds flow from offshore and blow eastward during the daytime hours. In summer, the sea breeze starts in mid-morning, peaks at 10-15 miles per hours and subsides after sundown. There is a calm period until about midnight. At that time the land breeze begins from the Northwest, typically becoming calm again about sunrise. In winter, the same general wind flow patterns exist except that summer wind speeds average slightly higher than winter wind speeds. This pattern of low wind speeds is a major factor which allows the pollutants to accumulate in the Basin.

The Basin complies with the state and federal standards for sulfur dioxide and sulfates. However, the Basin exceeds the ambient air quality standards for ozone, carbon monoxide, nitrogen dioxide and respirable particulate matter.

Ref: SCAQMD, CEQA Air Quality Handbook, April, 1993.
RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Vehicle / Equipment Emissions

The anticipated duration of excavation and demolition activities will be approximately 5 weeks. Site demolition, excavation and utilization of construction equipment will create temporary, short-term air quality impacts in the form of increased dust generation at the site during project activities. In

addition, the project will increase emissions created from vehicles used for demolition, excavation and construction activities, including:

* 1- diesel backhoe at 60 percent utilization for 5 weeks;
* 2- propane powered fork trucks at 60 percent utilization for a period of 8-10 weeks; and
* 1- gasoline powered truck mounted crane to be used for delivery of construction materials for a period of 4 days.

The project will also require the delivery of construction materials resulting in an increase of trucks typically operating at the site. The total number of temporary truck deliveries to the site will be approximately 250 trucks (including cement trucks, dump trucks and flat bed trucks) over a period of about 8-9 months. Truck trips to and from the facility for purposes of making deliveries of construction materials will temporarily increase the number of trucks currently entering and exiting the facility during a normal business day. Currently approximately 60-80 trucks associated with GNB daily business activities arrive at and depart from the facility on a daily basis.

Over the duration of this project, it is estimated that the number of truck trips will be limited to an increase of approximately 4-5 per day (at the peak of delivery) and will increase the round-trip truck visits to the facility by an average of 1 truck per day during the period of project implementation. The number of worker vehicles associated with this project is anticipated to be approximately 15-40 vehicles. As a condition of the permit, GNB will require trucks making deliveries or hauling materials from the project site to be on a phased scheduled and staged to reduce or eliminate unnecessary emissions.

With the limited number of trucks associated with this project, temporary nature of the truck deliveries and worker trips and permit conditions incorporated into the IS Modification over the period of 8-9 months of project implementation, it has been determined that the project activities will have a less-than-significant impact on air quality.

Equipment (i.e. vehicle and equipment emissions) used for excavation, demolition and construction activities associated with this project are exempt under Rule 219, Equipment Not Requiring A Written Permit Pursuant to Regulation II, SCAQMD. Equipment usage will consist of standard construction tools/machinery during all construction phases.

Fugitive Dust

Project activities include the excavation and movement of approximately 380 cubic yards of soils and 625 cubic yards of demolition concrete and pavement. With the excavation and movement of these materials, there exists the possibility for generation of fugitive dust. Given the nature of the facility operations which generates hazardous wastes (i.e. lead), there is a possibility that the excavated materials could be considered hazardous and, therefore, pose the potential for adverse air impacts. Consequently, the IS Modification will contain the following permit conditions to reduce these impacts:

1) all excavated soils will be placed in lined containers on-site and, unless actively filling containers, containers must be covered at all times to prevent fugitive dust from leaving the facility site;

2) excavation and demolition areas shall be watered at least twice daily to prevent the generation of and prevent fugitive dust from leaving the site;

3) samples of excavated materials will tested and profiled for levels of contamination;

4) excavation and demolition activities may require work area containment to prevent the release of airborne materials; and

5) perimeter fence monitoring will be established to track any release of airborne particulates and contaminants generated during demolition and excavation activities. These conditions to the permit will be required in order to ensure that any potential for adverse environmental impact from fugitive dust is reduced to a less-than-significant level.

In addition, during construction activities, water used as a dust suppressant will be applied in the construction area during excavation and earth-moving activities to reduce fugitive dust emissions. The use of water is a standard operating practice for fugitive dust suppression and is one method of complying with SCAQMD Rule 403 concerning reduction of fugitive dust.

Air Pollution Control System

The ventilation system to be installed as part of the Corridor project is a component of the air pollution control system at the facility and has been approved by the SCAQMD. Installation of this system (in conjunction with the corridor) will provide environmental benefits through reduction of fugitive emissions from the daily operation of the facility as required of the Consent Agreement between the Department and GNB.

Ref: SCAQMD, CEQA Air Quality Handbook, April, 1993.
SCAQMD, Mr. Marco Polo, January, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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4. Surface and Ground Water (Workbook; page 17)

Description of Environmental Setting:

The GNB facility is located in the Coastal Plain of Los Angeles which consists mainly of unconsolidated sediments or alluvium underlain by and bounded on the north and east by essentially bedrock. The coastal plain has been divided into four groundwater basins by geologic and surface features. The GNB facility is located within the Los Angeles Forebay area which is part of the Central Ground Water Basin. The Los Angeles Forebay Area is located in the northern part of the Central Ground Water Basin immediately south of the two systems flow through these breaks from the north valleys into the Coastal Plain. The Forebay areas have been described as ground water recharge areas or areas of free or unconfined ground water.

The area around the GNB facility is reportedly underlain by the Lakewood and the San Pedro Formation. The Lakewood formation includes portions of the Bellflower aquiclude and the Exposition, Gardena, and Gage aquifers in order of increasing depth. Groundwater elevation measurements have been taken at the GNB site. The depth to ground water averages in the range of 85 to 90 feet below the ground surface.

Precipitation in the Los Angeles area occurs as rainfall, with most falling during the winter months. Precipitation generally flows into surface water channels or groundwater basins. The Los Angeles River is the only water body located in the Vernon area. Direct storm water and surface water discharges in the area flow into the Los Angeles River, which is located about 1,000 feet from the GNB facility. According to the Federal Emergency Management Agency (FEMA), the GNB site and the entire City of Vernon is not located within a 100-year or 500-year flood plain.

A portion of the flood control drainage system crosses the plant property, in the form of a covered box culvert and an adjacent open concrete drainage ditch. Surface water run-off at GNB is controlled within the facility by a 2,395,000 gallon storm water retention pond located on the southeast portion of the site. The pond was constructed with a double liner and leak detection system.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

No increase in the amount of wastewater is expected as a result of this project since there would be no modifications to the facility processes. The construction of the Drop-out Box System will take place during periods of dry weather. Any surface water drainage generated by the minimal use of water used for dust suppression during the temporary and short term construction of the concrete vault can be handled by the existing drainage system. Therefore, no significant impact on water quality is expected from construction activities for the corridor and Drop-out Box System.

Depth to ground water ranges between 85 and 95 feet below the ground surface and will not be

impacted by this project. The maximum depth of excavation for all project activities is 15 feet for construction of the Drop-out Box System. Therefore, activities associated with this project will not impact ground water.

Ref: GNB, IS Modification Application, August 06, 1999.
GNB, ADEIR, EA, Inc., April, 1996.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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5. Plant Life (Workbook; page 20)

Description of Environmental Setting:

GNB is an existing facility located in the southern portion of Los Angeles County in the City of Vernon. The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The locations of proposed site activities are paved and concreted areas that have been previously disturbed and which are void of any existing plants and habitats. A search of the Department of Fish and Game, Natural Diversity Database revealed no unique, rare or endangered species of plant at or near the project site.

Ref: RCRA Facility Assessment, 1990
NDDB, Department of Fish and Game, May, 1999

Analysis of Potential Impacts:

Project excavation and construction activities will take place within the confines of the facility site in paved or concreted areas that have been previously disturbed and which are void of any existing plants and habitats. Therefore, project activities will not impact plant life.

Ref: NDDB, Department of Fish and Game, May, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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6. Animal Life (Workbook; page 22)

Description of Environmental Setting:

GNB is an existing facility located in the southern portion of Los Angeles County in the City of Vernon. The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The locations of proposed site activities are paved and concreted areas that have been previously disturbed. A visual inspection of the facility did not reveal the presence of animal life or associated habitats. In addition, a review of the Department of Fish and Game, Natural Diversity Database indicates that there are no existing wildlife habitats, common characteristic animal species, sensitive species including rare, threatened, or endangered, commercially and recreational valued species, aquatic communities at or near the project site.

Ref: RCRA Facility Assessment, 1990.
NDDB, Department of Fish and Game, May, 1999.

Analysis of Potential Impacts:

Project excavation and construction activities will take place within the confines of the facility site in paved or concreted areas that have been previously disturbed and which are void of any existing animal life and habitats. A security fence and gate surround the facility which would deter and prohibit the entry of animals. Therefore, project activities will not impact animal life.

Ref: NDDB, Department of Fish and Game, May, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

7.

Natural Resources (Workbook; page 25)

Description of Environmental Setting:

GNB operates a lead recycling and smeltering business. The facility is supplied with electricity by the City of Vernon and purchases approximately 24 million kilowatts of electricity annually. The facility uses water for dust suppression and the cleaning of equipment. Approximately, 12 million cubic feet of water is purchased GNB from the California Water Service. Facility operations also require the use of natural gas. The GNB facility purchases about 3 million therms annually.

Ref: RCRA Facility Assessment, 1990.

Analysis of Potential Impacts:

Project activities will require the use of standard construction equipment which would require the use of negligible amounts of electricity. In addition, construction activities will require the use of two propane powered forklift tractors at 60 percent utilization for about 8-10 weeks which would not consume significant amounts of propane. Additionally, this project will require the use of one diesel powered backhoe at 60 percent utilization for about 5 weeks which would not consume significant amounts of diesel fuel. Therefore, impacts to Natural Resources are expected to be less-than-significant.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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8.

Risk of Upset (Workbook; page 26)

Description of Environmental Setting:

The GNB facility is located in a heavy industrial area within the City of Vernon. The GNB facility is a manufacturer of lead-acid storage batteries, lead oxide and a smelter of secondary lead. A number of manufacturing and heavy industrial facilities are located near the facility site. In addition to adjacent industrial facilities, a number of major industrial facilities exist within five miles of GNB.

State regulations require the use of certified hazardous waste haulers for the transport of hazardous waste in California. Certified waste haulers are required to adhere to inspection and maintenance schedules and maintain sufficient insurance coverage.

GNB has a facility Contingency Plan as required under CCR, Title 22, §66264.51 that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of a hazardous constituent. The provisions of the Contingency Plan are carried out immediately whenever there is a fire, explosion or release of a hazardous constituent that could threaten human health or the environment. The following situations constitute an emergency requiring implementation of the contingency plan:

* Injury to an employee
* Major spills or material releases
* Fires and explosions

Emergency procedures are executed for any event associated with hazardous materials or hazardous waste involving any possible danger to personnel, equipment or the environment.

The Contingency Plan addresses all of the issues required under CCR, §66264.52 including:

* The actions facility personnel take in the event of an emergency.
* Arrangements with the local authorities, hospitals, contractors, and state and local emergency response teams.
* The names, addresses and telephone numbers of the designated Emergency Coordinator of the facility and the alternate contact.
* A list of emergency equipment at the facility, with the location and physical description of each item and a brief outline of its capabilities.
* An evacuation plan for the facility.

Ref: GNB, IS Modification Application, August 06, 1999.

Analysis of Potential Impacts:

Project activities include excavation and construction which will be within the perimeter of the facility.

All construction activities associated with the SEPs / Corridor and Drop-Out Box System will be performed in compliance with the latest revision of the Uniform Building Code and any other pertinent codes and/ or regulations set forth by the City of Vernon, Department of Building and Safety. GNB's Health and Safety Plan, as contained in the Contingency Plan, shall provide guidance for worker and public safety during the excavation, demolition and construction phases of this project.

The four 9,000 gallon settling tanks included in the Drop-Out Box System are to be installed on an approximately 20 feet by 70 feet concrete reinforced 24 inch thick foundation. As with any above ground tank, there is a potential that the tanks could release liquids due to a risk of upset condition. The installation of the foundation and support structures will be constructed in compliance with the latest revision of the Uniform Building Code, and in compliance with the City of Vernon, Department of Building and Safety. However, in the unlikely event a release does occur, as a condition of the ISD Permit Modification, the project proponent will be required to install a 16 inch high by 16 inch wide reinforced-steel concrete berm around the 20 feet by 70 feet perimeter of the four settling tanks (including the drop-out sump) to provide adequate secondary containment.

Implementation of the above requirements and operational controls are expected reduce the potential of any impact due to a risk of upset condition to a less-than-significant level.

Ref: RCRA Facility Assessment, 1990.
GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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9.

Transportation/Circulation (Workbook; page 29)

Description of Environmental Setting:

The regional highway network surrounding the GNB facility is shown in Figure 1. Two major freeways provide access to the site: Interstate 5 to the north and Interstate 710 to the east. The area also is served by a number of railroads. The Atchison Topeka and Santa Fe Railroad right-of-way runs east-west, north of GNB on the north side of E. 26th Street. Access to the project site is provided by Indiana Street, a local street which connects with Bandini Boulevard to the south and 26th Street to the north.

Traffic associated directly with GNB daily business activities include about 250 workers and about 60-80 trucks per day. Sufficient parking is provided for workers within the boundaries of the facility. Parking for permanent workers is provided on the site.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

It is estimated that approximately 250 truck trips to the facility are anticipated to occur over the 8-9 month project period. The number of project workers on the job at any one time will depend on the stage and/or phase of construction with the total number fluctuating between 15-40 during the 8-9 month project timeframe.

It is also estimated that approximately 170 concrete truck deliveries will required for this project. However, because of the phased construction plans of this multi-phased project, the delivery of concrete will be staged to accommodate the construction scheduling. This will result in intermittent deliveries of short duration during a 10-11 week period of project activities (averaging approximately 3-3.5 deliveries per day). In addition, an estimated total of 6 truck deliveries of construction materials and supplies will be required during the 8-9 months period of this project. Deliveries by concrete trucks and material/ supply trucks will be scheduled during non-peak traffic times and will be phased throughout the workday. This short term, intermittent use of trucks for delivery of concrete will result in a less-than-significant impact on traffic/circulation.

It is estimated that approximately 600-800 cubic yards of soils, concrete and pavement materials rom excavation and demolition will be containerized and hauled off site, requiring between 60-80 truck trips. The off- site hauling of the containerized materials will be phased and extended beyond the 5 week excavation/demolition period, thereby resulting in less-than-significant impacts on surrounding traffic/circulation.

Ref: GNB, IS Modification Application, August 06, 1999.
GNB, ADEIR, EA, Inc., April, 1996.

Cal/EPA Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 90201
TEL: (818) 551-2800

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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10.

Public Services (Workbook; page 31)

Description of Environmental Setting:

The City of Vernon Fire Department provides fire protection to the GNB facility. The City of Vernon Fire Department holds a mutual aid agreement with the Cities of Lynwood and Montebello. Should emergency backup fire protection be required, the Lynwood and Montebello Fire Departments will provide assistance. Each fire fighter has received training in all fire response aspects and generally trains on a daily basis to update fire fighting techniques. A majority of the fire fighters are trained as Emergency Medical Technicians. Paramedics in the area are contracted with private providers. On any shift, there are approximately nine fire fighters trained for hazardous materials responses. These Hazardous Materials Teams have received extensive training in the emergency response and handling of hazardous materials.

The City of Vernon Police Department has primary responsibility for police services for the GNB facility with the Huntington Park or Maywood Police Departments providing general police backup. In addition to public police departments, the GNB facility perimeter is secured to prohibit unauthorized entry to the site which has two operating gates for entry/exit to the facility.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.

Analysis of Potential Impacts:

This project involves short-term, standard construction activities at an established lead recycling and smeltering facility within the heavy industrial area of the City of West Covina. Project activities will not require an increase in existing public services and, therefore, will have no impact on public services.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

11.

Energy/ Utilities (Workbook; page 32)

Description of Environmental Setting:

GNB is supplied with electricity by the city of Vernon. In 1993, GNB purchased nearly 24 million kilowatts of electricity. The facility uses water for dust suppression and the cleaning of equipment. In 1994, GNB purchased 12.5 million cubic feet of water from the California Water Service. Enron Access supplies natural gas to GNB. In 1993, GNB purchased nearly 3 million therms from Enron Access for operation of the facility. (Also see discussion under *7. Natural Resources.*)

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.

Analysis of Potential Impacts:

Activities associated with this project include excavation, demolition and building construction. Project activities will not require additional use or demand for fuel or energy and will not require new or expanded utility systems. Therefore, this project will have no impact on utilities. (Also see discussion under *7. Natural Resources.*)

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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12.

Noise (Workbook; page 32)

Description of Environmental Setting:

The area surrounding the GNB facility is characterized by extensive, commercial and residential development and transportation corridors. The primary noise source in the area is attributed to vehicular traffic noise, with the highest noise contributor being the heavy truck traffic associated with industrial land uses. Vehicular traffic noise is significant on all roadways throughout the area, but the majority of the noise emanates from traffic on Bandini Boulevard. Other contributors to the ambient noise level in the general area include: 1) local railroads which run along East 26th Street, the Los Angeles River and Downey Street; 2) vehicular traffic along Indiana Street, East 26th Street, Downey Road an the 710 Freeway; and 3) industrial facilities in the area where the GNB facility is located, including slaughter houses, rendering plants, recycling and other industrial facilities.

The City of Vernon considers noise levels to be "normally compatible" if they are less than the Community Noise Equivalent Level (CNEL) of 80 decibels for industrial and some commercial land uses.
Ambient noise level readings were taken around the GNB facility at seven locations to determine the existing noise levels (See Figure 4). The ambient noise levels are as follows:

Location	Site #1	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7
Decibels	72.5	73.0	72.0	74.5	75.0	74.0	73.0

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Noise generated as a result of this project would be produced primarily from the operation of heavy equipment including trucks, a crane and a backhoe tractor during excavation, demolition and construction activities. The estimated noise levels calculated to be generated during construction and excavation at the site are shown below::

Location	Site #1	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7
Decibels	72.3	73.0	75.0	74.5	75.0	74.0	73.0

The calculated CNEL noise levels at the 7 locations surrounding the facility range from 72.3 to 75 decibels which complies with the City of Vernon noise ordinance which states that noise levels under 80 decibels are acceptable for industrial land uses

The project activities will be restricted to areas within the perimeter of the GNB facility where there

would be a potential for on site worker impacts. However, any potential impacts to on-site workers associated with noise generated by this project will be reduced to a less-than-significant level with compliance with Occupational Safety and Health Administration (OSHA) regulations requiring workers exposed to occupational noise levels greater than 90 decibels to have adequate hearing protection. In addition, noise generated from this project would minimally affect the nearest residential areas located about 0.75 miles from the facility and would result in a less than significant impact from project activities.

Therefore, noise generated from activities related to this project will have a less than significant impact on the environment.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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13.

Public Health and Safety (Workbook; page 34)

Description of Environmental Setting:

GNB is a manufacturer of lead-acid batteries, lead oxide and a smelter of secondary lead. The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. Lead recycling and smeltering activities have been conducted at the site since 1922. The GNB facility employees approximately 250 workers and will have between 60-80 truck deliveries to the facility during an average business day.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Analysis of Potential Impact:

As with most industrial facilities the potential for adverse health and safety impacts to workers and the public exist from daily operations. The proposed IS Permit Modification contains a Contingency Plan and Emergency Procedures that are designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of a hazardous waste.

This project involves the excavation of soils, demolition of concrete/pavement and building materials, and construction of a sumps, installation of tanks and building a corridor connecting to existing structures. Construction and excavation activities have the potential for generating fugitive dust and/or respirable particulate matter (PM_{10}) creating the potential for health and safety concerns. Demolition and construction activities will employ the best management practices for construction activities to reduce the possibility of fugitive dust and/or PM_{10}.

A worker Health and Safety Program for contractors and their employees doing work for GNB within the perimeter of the company is contained in the IS Permit Modification which is designed to minimize impacts to workers and the public which are associated with excavation, demolition and construction activities. Further, workers/employees involved with the demolition and construction activities must be trained in the handling of materials containing lead and lead oxide, thus reducing the potential for any adverse impacts associated with the generation of potentially contaminated lead fugitive dust.

In addition, ISD Modification will contain the following permit conditions: 1) all excavated soils shall be placed in lined containers on-site and, unless actively filling containers, containers must be covered at all times to prevent fugitive dust from leaving the facility site; 2) excavation and demolition areas shall be watered at least twice daily to prevent the generation of and prevent fugitive dust from leaving the site; 3) samples of excavated materials shall be tested and profiled to determine levels of

contamination; 4) excavation and demolition activities may require work area containment to prevent the release of airborne materials; and 5) perimeter fence monitoring shall be established to track any release of airborne particulates and contaminants generated during demolition and excavation activities.

Associated with construction of the corridor project is the air pollution control system which has been approved by the SCAQMD. Installation of this system in conjunction with the corridor project will provide environmental benefits through reduction of fugitive emissions from the daily operation of the facility as required of the Consent Agreement between the Department and GNB.

Implementation of the Contingency Plan, Health and Safety Program, compliance with the Uniform Building Code, best construction practices, Cal-OSHA Title 8 regulations, and compliance with all conditions of SCAQMD permits and DTSC's ISD Modification will reduce any potential health and safety project activity impacts to a less-than-significant level.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

14.

Aesthetics (Workbook; page 38)

Description of Environmental Setting:

The existing GNB facility is located in the southern portion of Los Angeles County in the City of Vernon (see Figure 1). The GNB facility is bounded to the north by East 26th Street and the Atchison, Topeka and Santa Fe railroad yard; to the south by Bandini Boulevard; to the east by Indiana Avenue; and to the west by Pioneer Aluminum. The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone (see Figure 3) which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plants and junk/salvage yards.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

The Drop-Out Box System and the corridor projects will be implemented within the perimeter of the existing facility. The Drop-Out Box System is compatible with the existing visual makeup of the facility. The corridor project involves connecting two existing buildings with a similar corridor structure which consists of similar construction materials and building elevation. The project will not result in an aesthetically unpleasant site and will not add to light or glare impacts. Because project activities are located within the existing facility site, the project will not block any views or obstruct any scenic vista or view open to the public. Therefore, this project will have no impact on aesthetics.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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15.

Cultural/ Paleontological Resources (Workbook; page 39)

Description of Environmental Setting:

Lead recycling and smeltering activities have been conducted at the site since 1922. The original grading of the site occurred prior to 1922 to provide a flat ground for operations. Prior to 1922, the site was the location of a rendering plant boneyard. Since 1922 the facility has expanded for the next sixty years culminating in the reconstruction of the facility in 1982. It is, therefore, assumed that no unique geological resources (paleontological resources or unique outcrops) are present at the site or in the general Vernon area that could be disturbed by the continued operation of the facility or the construction of the proposed modifications.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Analysis of Potential Impacts:

Since this project is located in an area where soils have already been disturbed, and no unique geological resources (paleontological resources or unique outcrops) appear to be present at the site or in the general Vernon area, no impacts to cultural or paleontological resources is expected as a result of implementation of the project activities associated with the draft ISD Permit Modification.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.
EA, Inc., ADEIR, August, 1996.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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16.

Cumulative Effects (Workbook; page 42)

Description of Environmental Setting:

The GNB facility is located in the southern portion of Los Angeles County in the City of Vernon. Vernon has been developed as a city zoned for manufacturing, commercial, industrial, warehousing, slaughtering, and rendering uses. The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The GNB facility is compatible with this zoning designation.

The regional highway network surrounding the GNB facility is shown in Figure 1. Two major freeways provide access to the site: Interstate 5 to the north and Interstate 710 to the east. The area also is served by a number of railroads. The Atchison, Topeka and Santa Fe railroad right-of-way runs east-west, north of GNB on the north side of E. 26th Street. Traffic associated directly with GNB's daily business activities include transportation vehicles for about 250 workers and about 60-80 trucks on a daily basis.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR , EA, Inc., April, 1996.

Analysis of Potential Impacts:

As discussed in the Earth, Air, Risk of Upset, and Transportation/Circulation sections of this Initial Study project activities will result in a less-than-significant impact for these media categories. With all other media, the Initial Study has determined that no impacts will result with the implementation of project activities. Excavation, demolition, and construction activities associated with this project will be short-term, temporary and intermittent in nature occurring over the estimated 8-9 months for project completion. No other like or similar projects will occur during the completion of all project activities. As such, it has been determined that because of its short-term, temporary and intermittent/phased aspects, this project will result in less-than-significant cumulative impacts.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	■	☐

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17. Population/Housing/Recreation (Workbook; page 43)

Description of Environmental Setting:

The GNB facility is located in the southern portion of Los Angeles County in the City of Vernon (see Figures 1 and 2). The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards (see Figure 3). The GNB facility is compatible with this zoning designation.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Project activities involve excavation of soils; demolition of structures, concrete and pavement; and on-site construction of tank foundations and a corridor building at an existing IS lead recycling and smeltering facility. This project will not result in or alter the location, distribution, density or growth rate of the human population; affect existing housing or create a demand for additional housing; or impact the quality or quantity of existing recreational opportunities; and, therefore, will have no impact on population, housing or recreation.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
☐	☐	☐	■

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18.

Mandatory Findings of Significance (Workbook; page 44)

	Potentially Significant Impact	*Potentially Significant Unless Mitigated*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	■
b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	☐	☐	☐	■
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☐	☐	☐	■
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	■

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V. DETERMINATION OF SIGNIFICANT EFFECT:

On the basis of this Initial Study:

■ I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

□ I find that although the proposed project COULD HAVE a significant effect on the environment, mitigation measures have been added to the project which would reduce these effects to less than significant levels. A NEGATIVE DECLARATION will be prepared.

□ I find that the proposed project COULD HAVE a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

Liang C. Chiang,	Hazardous Substances Engineer, P.E.
Name of Preparer	Title
Liang C. Chiang	12/09/1999
Signature of Preparer	Date

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ATTACHMENT A

INITIAL STUDY
REFERENCE LIST

GNB Technologies, Inc.
Approval of a CLASS 2 INTERIM STATUS MODIFICATION

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1. GNB, Interim Status (IS) Modification Application, August 06, 1999.

2. RCRA Facility Assessment, DTSC, 1990.

3. Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Game, May 1999.

4. GNB, Administrative Draft Environmental Impact Report, Environmental Associates, Inc., April, 1996.

INDIVIDUALS CONSULTED

Mr. Marco A. Polo
Air Quality Engineer II
South Coast Air Quality Management District

Nick Gleiter
Industrial Hygienist
State of California
Department of Industrial Relations
Division of Occupational Safety and Health